

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-88-E**

IN RE:

Dominion Energy South Carolina, Inc.'s)
2021 Avoided Cost Proceeding Pursuant to)
S.C. Code Ann. Section 58-41-20(A))
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**PINE GATE RENEWABLES, LLC'S
FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION
TO DOMINION ENERGY SOUTH
CAROLINA, INC.**

Pursuant to S.C. Code Ann. Regs. 103-833, Pine Gate Renewables, LLC ("PGR"), by and through its undersigned counsel, hereby submits this First Set of Interrogatories and Request for Production to Dominion Energy South Carolina, Incorporated ("DESC" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26, and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to PGR, the requested information as it becomes available.

INSTRUCTIONS

1. Responses to this discovery request should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below Interrogatories/Request for Production should be labeled using the same numbers as used herein.
4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.
5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.
6. Each request should be reproduced at the beginning of the response thereto.
7. If the response to any Interrogatory/Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.
8. This discovery request shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

9. For any document withheld under a claim of privilege, submit a Privilege Log and submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Interrogatory/Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each Interrogatory/Request for Production on the basis of the entire knowledge of DESC, including information in the possession of DESC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any discovery request cannot be answered in full, respond to the extent possible and specify the reasons for DESC's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Company" means DESC or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22, 2021, and as revised.

3. "Company" and "DESC" are defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof,

and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. "Communication(s)" when used in this Discovery Request shall include the transmittal of information by any means, written, oral, electronic or otherwise.

6. When used in referenced to a document, "identify," "identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no longer is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

INTERROGATORIES

1. Please refer to DESC's response to ORS Request 3-3 which states: "Additional operating reserves in the amount of 40% of the hourly solar forecast or 40% of actual solar generation are held as part of Operating Reserves during solar hours."
 - a. Please explain how DESC determined that 40% of forecasted/actual solar generation was the appropriate level of additional operating reserves needed to support solar integration?
 - b. Please explain how the 40% level corresponds to the Incremental Reserve Requirements shown on Table 9 of PBD-2?

2. Please refer to Direct Testimony of Peter B. David, p 25, describing the Fairfield Pumped Storage asset as follows: “The pumped storage is able to both (1) provide Operating Reserves when called on, and (2) generate energy to reduce the net load that must be met by the Company’s other generating assets.”

- a. Please provide the minimum time it takes for DESC’s system operators to do each of the following for the Fairfield Pumped Storage facility:

Stop pumping (if in pumping mode)

Switch from pumping mode to generating mode

Start generating (if neither generating nor pumping)

- b. Please explain why Table 13 in PBD-2 shows that the contribution of the Fairfield Pumped Storage facility is 0 (zero) MW in each of the examples listed?

REQUEST FOR PRODUCTION

1. Please refer to DESC’s response to ORS Request 3-3 which states: “Additional operating reserves in the amount of 40% of the hourly solar forecast or 40% of actual solar generation are held as part of Operating Reserves during solar hours.”
 - a. Please provide any studies, work papers, analyses, or references, DESC relied upon in identifying this 40% level.

[SIGNATURE PAGE FOLLOWS]

Respectfully Submitted,

/s/Richard L. Whitt

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*Both as Counsel for Intervenor, Pine Gate Renewables,
LLC.*

July 13, 2021